

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: * CHAPTER 13
MILTON GIBBS * BANKRUPTCY NO. 22-10565
*
Debtors *

ORDER

AND NOW, this day of , 202 , upon
consideration of JPMorgan Chase Bank's Motion for Relief from the
Automatic Stay and Debtor's answer thereto, and after hearing, it
is hereby ORDERED and DECREED that;

The Motion of JPMorgan Chase Bank for Relief From The
Automatic Stay Under Section 362 is DENIED.

BY THE COURT:

J.

Kenneth G. Harrison, Esquire
Fine Neshaminy Interplex Suite 115
Trevose, PA 19053

Kenneth E. West, Esquire (Trustee)
P.O. Box 1229
Philadelphia, PA 19105

Alyk L. Oflazian, Esquire
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P.O. Box 165028
Columbus, OH 43216-5028

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IN RE:	*	CHAPTER 13
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**DEBTOR'S ANSWER TO THE MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

Debtor, Milton Gibbs, by and through his attorney, Kenneth G. Harrison, Esquire, respectfully represents as follows:

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted.
5. Admitted only to that Exhibit "A" speaks for itself.
6. Admitted inky to that Exhibit "B" speaks for itself.
7. Denied as stated. Admitted in that Exhibit "C" speaks for itself. Denied in that Debtor has no knowledge of Creditor's belief.
8. Admitted.
9. Denied as stated. Admitted in that post-petition payments have been made by the Debtor. Denied in the Exhibit "D" is incorrect.
10. Admitted.
11. Admitted. By way of further answer, there was no equity in the vehicle to exempt.
12. Denied as a conclusion of law upon which no responsive pleading is required. By way of further answer, Debtor has made

some of the payments stated in this paragraph.

13. Denied as a conclusion of law upon which no responsive pleading is required. By way of further answer, Debtor has no knowledge is the statements in this paragraph are true and correct, therefore, strict proof thereof is demanded at trial.

14. Denied as a conclusion of law upon which no responsive pleading is required. By way of further answer, Debtor has no knowledge as to the relief sought by Creditor.

15. Denied as a conclusion of law upon which no responsive pleading is required.

DEFENSES

1. Movant has not shown the irreparable harm necessary to justify lifting of the automatic stay with respect to its car loan.

2. If Movant is entitled to relief from the stay, the stay should not be terminated and the Court should grant less drastic relief by conditioning or modifying the stay.

WHEREFORE, Debtor, Milton Gibbs, respectfully requests that this Honorable Court deny Movant's Motion for Relief From the Automatic Stay.

Respectfully submitted,

s/s Kenneth G. Harrison
Kenneth G. Harrison, Esquire
Five Neshaminy Interplex Suite 115
Trevose, PA 19053